

October 28, 1996

Michael Sewell
Air Quality Engineer
Monterey Bay Unified Air Pollution Control District
24580 Silver Cloud Court
Monterey, California 93940

Re: Title V Operating Permit
Pacific Energy - Crazy Horse Canyon Landfill

Dear Mr. Sewell:

Thank you for the opportunity to review the above referenced permit. In accordance with 40 CFR §70.8(c), and Monterey Rule 218, Section 3.5.2, EPA has reviewed the proposed permit as submitted on September 10, 1996, and revised on October 9, 1996 in response to EPA's comments during the phone conversation of October 7. We are writing to confirm additional changes to the October 9 version of the permit as you discussed with Regina Spindler of my staff.

As discussed, the test method referenced in condition #9 of the October 9 revised permit (Method 16A) is not an appropriate method for measuring the sulfur content of the landfill gas for determining compliance with condition #5. ASTM D 1072-80, ASTM D 3031-81, and ASTM D 3246-81 are all EPA-approved methods for measuring total sulfur in fuel gases. EPA has also approved South Coast Method 307 for measuring sulfur content. Any of these test methods would be acceptable for determining compliance with condition #5.

EPA agrees that it is unclear how responsibility for the requirement under the New Source Performance Standard (NSPS) for Landfills (40 CFR Part 60, Subpart WWW) to submit a design for the landfill gas collection and destruction system should be divided between Pacific Energy, the owner and operator of the destruction system, and the City of Salinas, the owner and operator of the landfill, including the gas collection system. We are continuing to investigate this issue. We recommend, however, that the requirement to submit a design for the destruction system remain on the permit since Pacific Energy is currently responsible for operating the destruction system. Pacific Energy will need to contribute to the design submittal even if the ultimate responsibility for submitting the complete collection and control plan rests with the City of

Salinas. For example, §60.756(d) requires that if a device other than an open flare or an enclosed combustor will be used to meet the emission limits, then the operator must provide information to EPA "as provided in §60.752(b)(2)(i)(B) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures." Section 60.752(b)(2)(i)(B) referenced in this paragraph requires that such information be included in the collection and control system design plan. Pacific Energy will need to supply this information for inclusion in the design plan.

Regarding other NSPS requirements, the permit should contain explicit permit conditions for the provisions of the regulation that apply to the control device. This will ensure that Pacific Energy clearly understands the portions of the NSPS that it is responsible for complying with. In addition to listing the emission limits from §60.752(b)(2)(iii)(B), the permit should contain the requirement for the initial performance test under §60.8 and specify the test methods (Method 25 or Method 18 of Appendix A) as required by §60.754(d). Other provisions for which explicit permit conditions should be included are §§60.753(f), 60.755(e), 60.756(d), 60.757(f), 60.758(b)(2), and 60.758(c).

If the District modifies the permit as requested herein, the EPA will consider its 45-day review period concluded. Please be reminded that any person may petition EPA within 60 days after the end of EPA's Title V review period to object to the permit. Since these petitions are generally based on comments raised during the public comment period, it is important to maintain a record of the commenters and issues raised during this process. These records must be made available to the public.

The terms contained in the permit referenced above are specific to this facility and do not create conditions for the use, operation, or reliance of any other party. Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening the permit for cause), the expiration of both EPA's review period and the public petition period without EPA objection does not compromise the Agency's authority to take such measures.

If you have any questions concerning this matter, please do not hesitate to contact Regina Spindler of our Permits Office at (415) 744-1251.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division

cc: Ray Menebroker, CARB